

**IN THE UNITED BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

IN RE: Miguel Angel Bravo	§ § § § §	CASE NO: 12-34943 CHAPTER 13
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DEBTOR(S)' MOTION TO MODIFY CONFIRMED PLAN

The Debtor(s) file this Motion to Modify their confirmed plan.

Notice of Time to Object and Notice of Hearing.

IF YOU WANT A HEARING, YOU MUST REQUEST ONE IN WRITING AND YOU MUST RESPOND SPECIFICALLY TO EACH PARAGRAPH OF THIS PLEADING. YOU MUST FILE YOUR OBJECTION WITH THE CLERK OF THE BANKRUPTCY COURT WITHIN TWENTY ONE DAYS (21) FROM THE DATE YOU WERE SERVED AND GIVE A COPY TO THE PERSON WHO SENT YOU THE NOTICE. OTHERWISE, THE COURT MAY TREAT THE PLEADING AS UNOPPOSED AND GRANT THE RELIEF.

IF A PARTY REQUESTS EMERGENCY CONSIDERATION, THE COURT MAY ACT EXPEDITIOUSLY ON THE MATTER. IF THE COURT ALLOWS A SHORTER RESPONSE TIME THAN TWENTY ONE (21) DAYS, YOU MUST RESPOND WITHIN THAT TIME. IF THE COURT SETS AN EMERGENCY HEARING BEFORE THE RESPONSE TIME WILL EXPIRE, ONLY ATTENDANCE AT THE HEARING IS NECESSARY TO PRESERVE YOUR RIGHT. IF AN EMERGENCY HEARING IS NOT SET, YOU MUST RESPOND BEFORE THE RESPONSE TIME EXPIRES.

IF AN OBJECTION OR RESPONSE IN OPPOSITION TO THIS PROPOSED MODIFICATION IS FILED, THEN A HEARING ON THIS PROPOSED MODIFICATION IS SET FOR HEARING ON OCTOBER 14, 2015, AT 10:00 AM AT THE UNITED STATES COURTHOUSE, 515 RUSK AVENUE, COURTROOM 404, 4th FLOOR, HOUSTON, TEXAS, 77002. IF AN OBJECTION IS NOT FILED WITHIN TWENTY ONE (21) DAYS FROM THE SERVICE OF THIS MOTION, THE COURT MAY CONSIDER THIS MOTION WITHOUT THE NECESSITY OF A HEARING.

1. HISTORY OF CASE. This case was filed on **July 2, 2012**. The plan was confirmed on September 25, 2015. The plan has previously been modified by order(s) entered on the following date: N/A

2. REASON FOR MODIFICATION. Debtor is modifying his confirmed Chapter 13 plan to cure arrears to the Chapter 13 Trustee. Debtor fell behind because he switched employers but it didn't work out with the new employer so he returned back to the old employer that is still garnishing from his payroll.

3. PLAN PAYMENTS UNDER CONFIRMED PLAN. The current plan (as modified through this date) requires payments as follows:

A. Months: 1-60 Payment: \$1400.00

4. PAYMENTS PREVIOUSLY MADE. As of the date this motion was filed, the Debtor(s) have made payments to the Chapter 13 Trustee totaling \$48,799.74. Attached as Exhibit "A" is a schedule of all amounts received by the Chapter 13 Trustee.

5. FUTURE PROPOSED PLAN PAYMENTS (AS MODIFIED). The proposed modified plan requires future payments as follows:

A. Months: 38-60 Payment: \$1,380.00

6. CURRENT DEFAULTS. The Debtor(s) are currently in default on payments to the Chapter 13 Trustee as follows:

Dollar amount in default: 2730.26
Number of months in default: 3.03
Last payment made: 8/25/15
Amount of last payment: 337.15

7. PROPOSED PLAN MODIFICATIONS:

A. All payments set forth in paragraph 6 are cured by this modification.

8. INTERIM PAYMENTS. Payments due under this modification will commence on the first due date after this modification is filed, whether or not the modification has yet been approved by the court.

9. BUDGET. The Debtor's schedules "I" and "J" that the Debtor(s) request to be considered with this modification are attached as exhibit "B".

10. ATTORNEYS' FEES (Check One):

☒ Debtor(s)' counsel shall be paid \$450.00 as a fixed fee for this modification. This box may not be checked if the modification was proposed within 120 days of the date on which the plan was confirmed.

☐ If Debtor(s)' counsel seeks compensation, a separate application will be filed. If no application is filed, no compensation will be paid.

Dated:

/s/ Miguel Angel Bravo
Signature of Debtor

August 31, 2015
Date

/s/ Kenneth A. Keeling

August 31, 2015
Date

Kenneth A. Keeling
Keeling Law Firm
3310 Katy Freeway, Suite 200.
Houston, Texas 77007

Attorney for Debtor(s)

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Miguel Angel Bravo	§	
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	§	
DEBTOR(S)	§	CHAPTER 13

CERTIFICATE OF SERVICE

I hereby certify a true and correct copy of the foregoing Motion to Modify has been served either electronically or by United States First Class Mail on this 1st day of September, 2015 to the following parties and the affected creditors listed below:

UNITED STATES TRUSTEE

United States Trustee
515 Rusk Ave
Houston, TX 77002

CHAPTER 13 TRUSTEE

David G. Peake
9660 Hillcroft, Suite 430
Houston, Texas 77096

DEBTOR(S)

Miguel Angel Bravo
6727 Casablanca Dr.
Houston, Texas 77088

CREDITOR(S)

IRS- Insolvency Section	IRS- Centralized Insolvency	United States Bankruptcy
Stop 5022 Hou	Operations	Court
1919 Smith Street	P.O. Box 21126	PO BOX 61288
Houston, Texas 77002	Philadelphia, PA 19114	Houston, Texas 77208

AT&T Services	Conn Appliances, INC., d/b/a	DIRECT TV
c/o James Grudus, Esq.	Conn's	P.O. BOX 6550
One AT&T Way, Room 3A218	f/k/a CAI,LP d/b/a Conn's	GREENWOOD VILLAGE, CO
Bedminster, NJ 07921	P.O. Box 2358	80155-6550
	Beaumont, Texas 77704-2358	

Finance America
P.O. Box 270100
Louisville, CO 80027

Finance America Corporation
P.O. Box 9700
Boulder, CO 80301

Ford Credit
P.O. Box 542000
Omaha, NE 68154

HSBC BANK
ATTN: BANKRUPTCY
P.O. BOX 5213
CAROL STREAM, IL 60197

Inwood West Community
Improvement Assoc.
c/o Daughtry & Jordan, P.C.
17044 El Camino Real
Houston, TX 77058

Jefferson Capital Systems, LLC
P.O. Box 7999
Saint Cloud, MN 56302-7999

Portfolio Recovery Assoc, LLC
P.O. Box 41067
Norfolk, VA 23541

T-Mobile/T-Mobile USA Inc.
P.O. Box 248848
Oklahoma City, OK
73124-8848

Wells Fargo Home Mortgage
Attn: BK Dept-MAC
#D3347-014
3476 Stateview Blvd.
Fort Mill, SC 29715

Respectfully submitted,
KEELING LAW FIRM

/s/ Kenneth A. Keeling

ATTORNEY FOR DEBTOR(S)